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Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Western District of PennsylvaniaErie DivisionGERALD MARK ARTHUR DIXIE

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

KEYBANK NATIONAL ASSOCIATION
and ANTHONY BLAKESLEE

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:24-CV-120

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐

Yes

☐

No

RECEIVED

MAY 06 2024

CLERK, U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT
OF PENNSYLVANIA

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

GERALD MARK ARTHUR DIXIE
c/o 834 LAFAYETTE Street Apt #1
Jamestown CHAUTAUQUA
state of NEW YORK [14701]
(716) 462-1864
thecreationblockUC@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

KeyBANK National Association
 Subsidiary of KeyCorp
 1468 West Gore Road
 Erie and Erie County
 Pennsylvania and 16509
 (814) 871-1189
 ø

Defendant No. 2

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

Anthony Blakeslee
 Bank officer
 1468 West Gore Road
 Erie and Erie County
 Pennsylvania and 16509
 (814) 871-1189 (work number)
 ø

Defendant No. 3

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

Defendant No. 4

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Consumer Credit Protection Act; 12 usc 1431; 18 usc 8; 12 usc 412; 15 usc 779(A); 15 usc 45

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

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b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

 III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

#2
The defendant, Anthony Blakelee, negligence of fiduciary duties within the consumer credit transaction April 16th, 2024 at 1468 West Gore Road in Erie, PA 16509 led to a fraudulent denial of access to credits, notified by mail May 2nd, dated April 21st, 2024 from Defendant #1, KeyBANK.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

IV. Relief

PLAINTIFF RESPECTFULLY DEMANDS

- 1.) Reversal of the denied extension of credit application; and the creation of the Principal account with correct book-entry amount, that is to be calculated and confirmed at conclusion of hearing or settlement.
- 2.) Attach presented tender to application that has been reversed to accepted
- 3.) Upon establishment of the Principal account, Plaintiff demands that the Court order the crediting of Principal account with the following amounts:
 - Damages pursuant to 15 USC 1640, totaling twice the finance charge (\$65,000.00 x 2 = \$130,000.00), as a result of Defendant's violation of the Truth in Lending Act (TILA);
 - Calculate from the dated denial letter, April 21, 2024 to the day of hearing or settlement, a second-tier civil money penalty pursuant to Federal Reserve Section 29, as a consequence of Defendant's breach of fiduciary duties.
- 4.) Including COSTS AND ATTORNEY'S FEES
- 5.) Plaintiff's last prayer for relief: the clerk of the court to calculate and enter judgement for the damages awarded.

Plaintiff respectfully requests that this Honorable Court grant this relief and hold Defendant accountable for its unlawful actions.

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V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff

gerald - Mark - Arthur : dixie
GERALD MARK ARTHUR DIXIE

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address